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CHEVRON U.S.A. INC.,
9 a Pennsylvania corporation

10
11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

13 MARK SNOOKAL, an individual,

14 Plaintiff,

15 vs.

16 CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
17 inclusive,

18 Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DECLARATION OF H. SARAH FAN IN
SUPPORT OF DEFENDANT
CHEVRON U.S.A., INC.'S
OPPOSITION TO PLAINTIFF'S EX
PARTE APPLICATION FOR LEAVE
TO FILE A MOTION TO COMPEL
FURTHER DISCOVERY AND TO FILE
A MOTION FOR SANCTIONS**

(Dkt. No. 47)

District Judge: Hon. Hernán De. Vera
Magistrate Judge: Hon. A. Joel Richlin

Action Filed: August 3, 2023
Trial Date: August 19, 2025

DECLARATION OF H. SARAH FAN

I, Sarah Fan, declare as follows:

1. I am an attorney licensed to practice law in California. I am an associate with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron U.S.A., Inc., a Pennsylvania corporation (“Chevron U.S.A.”). I make I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. Plaintiff has taken six depositions in this case thus far, including four of the doctors involved in the MSEA determination—Dr. Mark Levy, Dr. Eshiofe Asekomeh, Dr. Ujomoti Akintunde, and Dr. Victor Adeyeye. Aside from Dr. Levy, these doctors have never been employed by Chevron U.S.A., and their depositions had to be coordinated through Chevron Nigeria, Limited (“Chevron Nigeria”), which is a wholly separate and distinct corporate entity from Chevron U.S.A. I defended the depositions of Drs. Akintunde and Adeyeye, and neither of these witnesses testified that Dr. Stephen Frangos was involved in Plaintiff’s MSEA determination in any way, nor indicated that he was a decisionmaker with respect to the determination.

3. On November 15, 2024, at 6:00 a.m., I attended the deposition of Dr. Victor Adeyeye as noticed by Plaintiff. I am in possession of his deposition transcript.

4. After Plaintiff noticed the depositions of the doctors located in Nigeria, Chevron U.S.A. worked diligently to coordinate with Chevron Nigeria regarding the doctors’ availability for deposition, taking into account their schedules, availability, and clinical duties, as well as the 8-9 hour time difference between California and Nigeria.

5. On January 16, 2025, taking advantage of the reopened discovery period, Plaintiff’s counsel met and conferred for the first time regarding Requests for Production of Documents which were propounded throughout the life of this matter, demanding further production and supplementation of documents and information regarding numerous Requests for Production. Despite the fact that Plaintiff had already dismissed

1 his age discrimination claim, Plaintiff sought extensive production of documents, which
2 also encompassed the dismissed claim, and which required further meet and confer
3 between the parties. Since then, during my meet and confer discussions with Plaintiff's
4 counsel, Olivia Flechsig, including during telephone calls on February 24, 2025, and
5 February 26, 2025, I kept Ms. Flechsig apprised of the timeline regarding the collection
6 of documents and information from Chevron Nigeria, as well as regarding issues with the
7 document collection. For example, some of the documents collected involved encrypted
8 email correspondence from Chevron Nigeria which could not be accessed or reviewed
9 until they had been decrypted by IT personnel.

10 6. During the meet and confer process, I consistently agreed to attend an
11 informal discovery conference regarding any outstanding discovery issues and have
12 always maintained that Chevron U.S.A. would do so. Ms. Flechsig and I agreed during
13 these meet and confer discussions that the parties would jointly seek an informal
14 discovery conference with the Magistrate Judge once the parties had narrowed the
15 remaining discovery issues following receipt of Chevron U.S.A.'s supplemental
16 document production.

17 7. Chevron U.S.A. produced additional documents pursuant to the parties'
18 meet and confer efforts on March 11, 2025. I also provided available dates for an
19 informal discovery conference with the Magistrate Judge, and informed Ms. Flechsig that
20 we could provide additional dates of availability if necessary. I never received a response
21 from Ms. Flechsig to my email.

22 8. On March 25, 2025, I received a phone call from Ms. Flechsig advising that
23 she would be filing an ex parte application on Plaintiff's behalf to seek leave to file a
24 motion to compel and for sanctions. When I asked, Ms. Flechsig indicated that the basis
25 of Plaintiff's request for sanctions was Plaintiff's contention that the documents produced
26 by Chevron U.S.A. on March 11, 2025, should have been produced earlier in response to
27 Plaintiff's first set of Requests for Production of Documents, even though this matter had
28 been previously addressed by the Court regarding Plaintiff's first ex parte application on

1 this subject.

2 9. During the call with Ms. Flechsig, I also asked whether the parties could
3 reach an agreement to informally resolve the subject of Plaintiff's ex parte application,
4 including whether Plaintiff believed additional time was necessary to conduct further
5 discovery regarding the documents produced. Ms. Flechsig denied that this was the case
6 and stated that Plaintiff was not requesting leave to reopen discovery or to change any
7 existing schedules in the case, and restated that Plaintiff needed to proceed with his ex
8 parte application.

9 10. A true and correct copy of Chevron U.S.A.'s responses to Plaintiff's first set
10 of Requests for Production of Documents, which were served on June 6, 2024, are
11 attached here as **Exhibit D**. Plaintiff's counsel did not meet and confer regarding these
12 responses until January 16, 2025.

13 11. A true and correct copy of Chevron U.S.A.'s responses to Plaintiff's second
14 set of Requests for Production of Documents, which were served on August 12, 2024, are
15 attached here as **Exhibit E**. Plaintiff's counsel did not meet and confer regarding these
16 responses until January 16, 2025.

17
18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct, and that this Declaration was executed on April 2, 2025, at
20 Culver City, California.

21
22 /s/ Sarah Fan

23 H. SARAH FAN
24
25
26
27
28

EXHIBIT D

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
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2 Including Professional Corporations

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9 Attorneys for Defendant.

CHEVRON U.S.A. INC. a Pennsylvania corporation

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

14 MARK SNOOKAL, an individual,

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17 CHEVRON USA, INC., a California
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18 inclusive,

19 Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DEFENDANT CHEVRON U.S.A. INC.'S
RESPONSE TO PLAINTIFF MARK
SNOOKAL'S REQUEST FOR
PRODUCTION, SET ONE**

Action Filed: August 3, 2023
Trial Date: February 4, 2025

21 PROPOUNDING PARTY: PLAINTIFF MARK SNOOKAL

22 RESPONDING PARTY: DEFENDANT CHEVRON USA. INC.

23 SET NO.: ONE (1)

24 NUMBERS: 1-22

1 Pursuant to Federal Rule of Civil Procedure Rule 34, Defendant CHEVRON
2 U.S.A. INC. a Pennsylvania corporation (“Defendant” or “CHEVRON U.S.A. INC.”) for
3 itself and no other party, hereby objects and responds to the Request for Production of
4 Documents, Set No. One (“Requests”) served by Plaintiff MARK SNOOKAL
5 (“Plaintiff”), as set forth below.

6 **PRELIMINARY STATEMENT**

7 These responses are made solely for purposes of this action. Each response and/or
8 production is subject to all objections as to competence, relevance, materiality,
9 confidentiality, propriety, admissibility, privilege, privacy, propriety information, trade
10 secrets and the like, and any and all other objections and grounds which would require
11 the exclusion of any statements contained herein, if such statements were made by a
12 witness present and testifying at court, all of which objections and grounds are reserved
13 and may be interposed at the time of trial.

14 Defendant has not yet completed its investigation of the facts relating to this case,
15 has not fully completed discovery in this matter, and has not fully completed preparation
16 for trial. Accordingly, all of the following responses are based upon information and
17 documents presently available to and specifically known to Defendant at this time.
18 Furthermore, these responses disclose only those contentions that presently occur to
19 Defendant. Defendant is not making any incidental or implied admissions regarding the
20 contents of these documents. The fact that Defendant has responded or objected to any
21 Request or part thereof should not be taken as an admission that Defendant accepts or
22 admits the existence of any fact set forth or assumed by Plaintiff’s Request, or that such
23 response or objection constitutes admissible evidence. The fact that Defendant has
24 answered part or all of any Request is not intended and shall not be construed to be a
25 waiver by Defendant of all or any part of any objections to any Request.

26 It is anticipated that further discovery, independent investigation, legal research
27 and analysis will supply additional facts and add meaning to the known facts as well as
28 establish entirely new factual contentions and legal contentions, all of which may lead to

1 substantial additions to, changes in and variations from the responses set forth herein.
2 These responses are given without prejudice to Defendant's rights to produce evidence of
3 any subsequently discovered facts or documents and/or tangible things that Defendant
4 may later discover or recall. Accordingly, Defendant hereby reserves the right to add to,
5 modify or otherwise change or amend the responses herein as additional facts are
6 ascertained, analysis and contentions are made, and legal research is completed. The
7 responses contained herein are made in a good faith effort to supply as much factual
8 information and specification of legal contentions as is presently known, but should in no
9 way be to the prejudice of Defendant in relation to further discovery, research or legal
10 analysis.

11 To the extent that the Request calls for information which was prepared in
12 anticipation of litigation for trial or for information or material covered by the work
13 product doctrine, or which constitutes information which is privileged or related to
14 confidential trade secrets or the privilege of privacy (including the freedom of association
15 and financial privacy), Defendant objects to responding to such Request and thus will not
16 supply nor render any information or documents protected from discovery by virtue of
17 the work product doctrine, the attorney client privilege, or the trade secret or privacy
18 privilege.

19 This preliminary statement is incorporated herein by reference to each of the
20 responses below as if stated in full.

21 **GENERAL OBJECTIONS**

22 1. Defendant objects to each and every Request to the extent it seeks
23 information privileged against disclosure by the attorney-client privilege and/or attorney
24 work-produce doctrine. No response, identification, or production should be construed as
25 a waiver of either the attorney-client privilege or attorney work-product doctrine.

26 2. Defendant objects to each and every Request to the extent it seeks
27 information that is confidential, proprietary, or a business or trade secret.
28

3. Defendant objects to each and every Request to the extent it seeks information pertaining to a non-party that is protected from disclosure by, among other things, the California Constitution's right of privacy and other privacy privileges.

4. In responding to the following Requests, Defendant does not concede the relevance or materiality of any such area of inquiry or document request to the subject matter of this litigation.

5. Inadvertent production of privileged information by Defendant shall not constitute a waiver of any applicable privilege or doctrine, including but not limited to objections on the basis of competency, confidentiality, relevancy, materiality, privilege and/or admissibility of evidence as such objections may apply at trial or otherwise in this action.

6. Defendant objects to each and every Request to the extent it is overbroad and unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, on the grounds that a Request lacks reasonable date or time parameters.

7. Defendant objects to each and every Request to the extent it is vague, ambiguous, and/or unintelligible.

8. Defendant objects to each and every Request to the extent the requested information or documents are available from other sources and/or from other means.

Each of the foregoing general objections is hereby incorporated by reference into each specific objection to each Request as if separately stated therein.

RESPONSES TO REQUESTS FOR THE PRODUCTION OF DOCUMENTS
REQUEST FOR PRODUCTION NO. 1:

Any and all documents which support describe **YOUR** personnel policies and procedures in effect from January 1, 2019 to January 1, 2022, including, but not limited to **YOUR** policies relating to:

- . (a) Disability Accommodations;
- . (b) Discrimination;

- 1 . (c) Harassment;
- 2 . (d) Transfers;
- 3 . (e) Hiring;
- 4 . (f) Performance evaluations;
- 5 . (g) Standards of Conduct.
- 6 . (h) Discipline;
- 7 . (i) Discrimination complaint processes; and
- 8 . (j) Equal employment opportunity (EEO) policies.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

10 Defendant hereby incorporates by reference the general objections set forth above.
11 Defendant objects to this request on the grounds that it seeks documents that are not
12 relevant to the subject matter involved in the pending action and disproportionate to the
13 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
14 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
15 to the subject matter involved in the pending action. Defendant objects to this request to
16 the extent and as phrased, that it seeks documents that are protected from disclosure by
17 the attorney-client privilege and/or the attorney work product doctrine. Defendant
18 objects to this request to the extent that it seeks confidential and/or proprietary business
19 information. Defendant objects to this request on the grounds that the term “YOUR” is
20 overbroad.

21 Subject to and without waiving any of its objections, Defendant responds as
22 follows: Defendant will produce its HR Policy for U.S.-Payroll Employees regarding
23 Equal Employment Opportunity, its HR Policy for U.S.-Payroll Employees regarding
24 Employment of Individuals With Disabilities, its HR Policy for U.S.-Payroll Employees
25 regarding Performance Management Program, its HR Policy for U.S.-Payroll Employees
26 regarding Protected Rates of Pay, and its Employee Handbook for the El Segundo
27 Refinery, each for the time period of January 1, 2019 through the termination of
28 Plaintiff’s employment on August 20, 2021 in its possession, custody or control.

1 **REQUEST FOR PRODUCTION NO. 2:**

2 Any and all employee handbooks which **YOU** provided to Plaintiff during his
3 employment with **YOU**.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

5 Defendant hereby incorporates by reference the general objections set forth above.
6 Defendant objects to this request on the grounds that it seeks documents that are not
7 relevant to the subject matter involved in the pending action and disproportionate to the
8 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
9 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
10 to the subject matter involved in the pending action. Defendant objects to this request to
11 the extent and as phrased, that it seeks documents that are protected from disclosure by
12 the attorney-client privilege and/or the attorney work product doctrine. Defendant
13 objects to this request to the extent that it seeks confidential and/or proprietary business
14 information. Defendant objects to this request on the grounds that the term “YOU” is
15 overbroad.

16 Subject to and without waiving any of its objections, Defendant responds as
17 follows: Defendant will produce its Employee Handbook for the El Segundo Refinery for
18 the time period of January 1, 2019 through the termination of Plaintiff’s employment on
19 August 20, 2021 in its possession, custody or control.

20 **REQUEST FOR PRODUCTION NO. 3:**

21 The complete personnel file for Plaintiff.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

23 Defendant objects to this request to the extent and as phrased, that it seeks
24 documents that are protected from disclosure by the attorney-client privilege and/or the
25 attorney work product doctrine.

26 Subject to and without waiving any of its objections, Defendant responds as
27 follows: Defendant will produce Plaintiff’s entire personnel file that Defendant
28

1 maintained in the ordinary course of business in connection with Plaintiff's employment
2 with Defendant in its possession, custody or control.

3 **REQUEST FOR PRODUCTION NO. 4:**

4 The complete contents of any other file or files, other than Plaintiffs personnel file,
5 maintained by **YOU** which refer to or are regarding Plaintiff.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

7 Defendant hereby incorporates by reference the general objections set forth
8 above. Defendant objects to this request on the grounds that it seeks documents that are
9 not relevant to the subject matter involved in the pending action and disproportionate to
10 the needs of the case. Defendant objects to this request on the grounds that it is
11 overbroad, unduly burdensome, oppressive and harassing, as it seeks documents that are
12 not related to the subject matter involved in the pending action. Defendant objects to this
13 request to the extent and as phrased, that it seeks documents that are protected from
14 disclosure by the attorney-client privilege and/or the attorney work product doctrine.
15 Defendant objects to this request to the extent that it seeks confidential and/or proprietary
16 business information. Defendant objects to this request on the grounds that the term
17 "YOU" is overbroad.

18 Subject to and without waiving any of its objections, Defendant responds as
19 follows: Defendant will produce all non-privileged documents responsive to this request
20 in its possession, custody and control, which include all documents from Human
21 Resources, and payroll-related documents in its possession, custody or control.

22 **REQUEST FOR PRODUCTION NO. 5:**

23 All documents or communications evincing or relating to any formal and/or
24 informal praise, positive performance feedback, awards, accolades, promotions, merit-
25 based bonuses or raises which **YOU** gave to Plaintiff for his performance from January 1,
26 2017 to January 1, 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request to the extent and as phrased, that it seeks documents that are protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this request to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this request on the grounds that the term “YOU” is overbroad.

Subject to and without waiving any of its objections, Defendant responds as follows: Defendant will produce all the performance evaluations that Plaintiff received during with Plaintiff’s employment with Defendant and Plaintiff’s payroll records for the time period of January 1, 2019 through the termination of Plaintiff’s employment on August 20, 2021 in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 6:

Any and all performance reviews given to Plaintiff during his employment with **YOU**.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request to the extent and as phrased, that it seeks documents that are protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this request to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this request on the grounds that the term “YOU” is overbroad.

Subject to and without waiving any of its objections, Defendant responds as follows: Defendant will produce all of the performance evaluations and other documents

1 that relate to Plaintiff's job performance that Plaintiff received during with Plaintiff's
2 employment with Defendant in its possession, custody or control.

3 **REQUEST FOR PRODUCTION NO. 7:**

4 Any and all documents which evidence or otherwise pertain to compensation
5 received by Plaintiff while employed by **YOU**, including, but not limited to, salary,
6 incentives, benefits, bonuses, tax neutralization benefits, stock options, profit sharing
7 plans, medical and dental insurance, retirement benefits, and life insurance, from January
8 1, 2015 to January 1, 2022.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

10 Defendant hereby incorporates by reference the general objections set forth above.
11 Defendant objects to this request on the grounds that it seeks documents that are not
12 relevant to the subject matter involved in the pending action and disproportionate to the
13 needs of the case. Defendant objects to this request to the extent and as phrased, that it
14 seeks documents that are protected from disclosure by the attorney-client privilege and/or
15 the attorney work product doctrine. Defendant objects to this request to the extent that it
16 seeks confidential and/or proprietary business information. Defendant objects to this
17 request on the grounds that the term "YOU" is overbroad.

18 Subject to and without waiving any of its objections, Defendant responds as
19 follows: Defendant will produce Plaintiff's payroll records, Employee Handbook for the
20 El Segundo Refinery, policies that applied to Plaintiff's employment compensation in its
21 possession, custody or control.

22 **REQUEST FOR PRODUCTION NO. 8:**

23 Any and all documents which evidence or otherwise pertain to compensation
24 including, but not limited to, salary, incentives, benefits, bonuses, tax neutralization
25 benefits, stock options, profit sharing plans, medical and dental insurance, retirement
26 benefits, and life insurance, for the Reliability Engineering Manager Position in Escravos,
27 Nigeria, salary grade 22.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive and harassing, as it seeks documents that are not related to the subject matter involved in the pending action. Defendant objects to this request to the extent and as phrased, that it seeks documents that are protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this request to the extent that it seeks confidential and/or proprietary business information.

Subject to and without waiving any of its objections, Defendant responds as follows: Defendant will produce the pay scale for salary grade 22 for the Reliability Engineering Manager position in Escravos, Nigeria, as well as Defendant's Tax Equalization Policy and chart of Location Premiums by Areas of Assignment for Rotational Assignments for the time period of January 1, 2019 through the termination of Plaintiff's employment on August 20, 2021 in its possession, custody or control.

REQUEST FOR PRODUCTION NO. 9:

Any and all documents which evidence or otherwise pertain to compensation including, but not limited to, salary, incentives, benefits, bonuses, tax neutralization benefits, stock options, profit sharing plans, medical and dental insurance, retirement benefits, and life insurance, for the Reliability Engineering Manager Position in Escravos, Nigeria, salary grade 23.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request on the grounds that it is overbroad,

1 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
2 to the subject matter involved in the pending action. Defendant objects to this request to
3 the extent and as phrased, that it seeks documents that are protected from disclosure by
4 the attorney-client privilege and/or the attorney work product doctrine. Defendant
5 objects to this request to the extent that it seeks confidential and/or proprietary business
6 information.

7 Subject to and without waiving any of its objections, Defendant responds as
8 follows: Defendant will produce the pay scale for salary grade 23 for the Reliability
9 Engineering Manager position in Escravos, Nigeria, as well as Defendant's Tax
10 Equalization Policy and chart of Location Premiums by Areas of Assignment for
11 Rotational Assignments for the time period of January 1, 2019 through the termination of
12 Plaintiff's employment on August 20, 2021 in its possession, custody or control.

13 **REQUEST FOR PRODUCTION NO. 10:**

14 All documents about or concerning **YOUR** decision to deem Plaintiff "not fit for
15 duty" for the Reliability Engineering Manager position in Escravos, Nigeria.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

17 Defendant hereby incorporates by reference the general objections set forth above.
18 Defendant objects to this request on the grounds that it seeks documents that are not
19 relevant to the subject matter involved in the pending action and disproportionate to the
20 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
21 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
22 to the subject matter involved in the pending action. Defendant objects to this request to
23 the extent and as phrased, that it seeks documents that are protected from disclosure by
24 the attorney-client privilege and/or the attorney work product doctrine. Defendant
25 objects to this request to the extent that it seeks confidential and/or proprietary business
26 information. Defendant objects to this request on the grounds that the term "YOUR" is
27 overbroad.
28

1 Subject to and without waiving any of its objections, Defendant responds as
2 follows: Defendant will produce the medical forms and examination records that were
3 completed in connection with the assessment of Plaintiff's medical fitness for duty for the
4 Reliability Engineering Manager position in Escravos, Nigeria, as well as relevant
5 correspondence from Plaintiff, Dr. Sahid Khan (Plaintiff's cardiologist), Dr. Scott Levy
6 (Chevron's Regional Medical Manager for Europe, Eurasia, Middle East & Africa), and
7 other medical professionals affiliated with Chevron Nigeria Limited in its possession,
8 custody or control.

9 **REQUEST FOR PRODUCTION NO. 11:**

10 All documents reflecting any communications between **YOU** and any of Plaintiff's
11 medical providers, from January 1, 2019 to January 1, 2022.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

13 Defendant hereby incorporates by reference the general objections set forth above.
14 Defendant objects to this request on the grounds that it seeks documents that are not
15 relevant to the subject matter involved in the pending action and disproportionate to the
16 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
17 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
18 to the subject matter involved in the pending action. Defendant objects to this request to
19 the extent and as phrased, that it seeks documents that are protected from disclosure by
20 the attorney-client privilege and/or the attorney work product doctrine. Defendant
21 objects to this request to the extent that it seeks confidential and/or proprietary business
22 information. Defendant objects to this request on the grounds that the term "YOU" is
23 overbroad.

24 Subject to and without waiving any of its objections, Defendant responds as
25 follows: Defendant will produce all correspondence between Dr. Scott Levy (Chevron's
26 Regional Medical Manager for Europe, Eurasia, Middle East & Africa) and Dr. Sahid
27 Khan (Plaintiff's cardiologist) in its possession, custody or control.

1 **REQUEST FOR PRODUCTION NO. 12:**

2 All documents reflecting complaints made by Plaintiff to **YOU**, including without
3 limitation, disability discrimination complaints to the Chevron Ombudsman and
4 Chevron's Human Resources, from January 1, 2019 to January 1, 2022.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

6 Defendant hereby incorporates by reference the general objections set forth above.
7 Defendant objects to this request on the grounds that it seeks documents that are not
8 relevant to the subject matter involved in the pending action and disproportionate to the
9 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
10 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
11 to the subject matter involved in the pending action. Defendant objects to this request to
12 the extent and as phrased, that it seeks documents that are protected from disclosure by
13 the attorney-client privilege and/or the attorney work product doctrine. Defendant
14 objects to this request to the extent that it seeks confidential and/or proprietary business
15 information. Defendant objects to this request on the grounds it assumes Plaintiff made a
16 complaint of disability discrimination. Defendant objects to this request on the grounds
17 that the term "YOU" is overbroad.

18 Subject to and without waiving any of its objections, Defendant responds as
19 follows: Defendant will produce Plaintiff's correspondence and communications with
20 Defendant's Human Resources personnel concerning any complaints of disability
21 discrimination for the period of January 1, 2019 through the termination of Plaintiff's
22 employment on August 20, 2021 in its possession, custody or control. Defendant will
23 also produce its correspondence with the California Department of Fair Employment and
24 Housing (now called the California Civil Rights Department) concerning Plaintiff's
25 administrative complaint against Defendant in its possession, custody or control.
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27
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1 **REQUEST FOR PRODUCTION NO. 13:**

2 Any and all communications about or concerning Plaintiff's complaints to **YOU**,
3 from January 1, 2019 to January 1, 2022. Plaintiff's complaints to **YOU** include without
4 limitation, disability discrimination complaints to the Chevron Ombudsman and
5 Chevron's Human Resources.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

7 Defendant hereby incorporates by reference the general objections set forth above.
8 Defendant objects to this request on the grounds that it seeks documents that are not
9 relevant to the subject matter involved in the pending action and disproportionate to the
10 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
11 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
12 to the subject matter involved in the pending action. Defendant objects to this request to
13 the extent and as phrased, that it seeks documents that are protected from disclosure by
14 the attorney-client privilege and/or the attorney work product doctrine. Defendant
15 objects to this request to the extent that it seeks confidential and/or proprietary business
16 information. Defendant objects to this request on the grounds it assumes Plaintiff made a
17 complaint of disability discrimination. Defendant objects to this request on the grounds
18 that the term "YOU" is overbroad.

19 Subject to and without waiving any of its objections, Defendant responds as
20 follows: Defendant will produce Plaintiff's correspondence with Defendant's Human
21 Resources personnel concerning any complaints of disability discrimination for the
22 period of January 1, 2019 through the termination of Plaintiff's employment on August
23 20, 2021 in its possession, custody or control. Defendant will also produce its
24 correspondence with the California Department of Fair Employment and Housing (now
25 called the California Civil Rights Department) concerning Plaintiff's administrative
26 complaint against Defendant in its possession, custody or control.
27
28

1 **REQUEST FOR PRODUCTION NO. 14:**

2 Any and all documents reflecting **YOUR** alleged efforts to investigate any of
3 Plaintiff's complaints of discrimination and/or failure to accommodate a disability,
4 including any of **YOUR** investigative files relating to same.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

6 Defendant hereby incorporates by reference the general objections set forth above.
7 Defendant objects to this request on the grounds that it seeks documents that are not
8 relevant to the subject matter involved in the pending action and disproportionate to the
9 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
10 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
11 to the subject matter involved in the pending action. Defendant objects to this request to
12 the extent and as phrased, that it seeks documents that are protected from disclosure by
13 the attorney-client privilege and/or the attorney work product doctrine. Defendant
14 objects to this request to the extent that it seeks confidential and/or proprietary business
15 information. Defendant objects to this request on the grounds it assumes Plaintiff made a
16 complaint of disability discrimination. Defendant objects to this request on the grounds
17 that the term "YOUR" is overbroad.

18 Subject to and without waiving any of its objections, Defendant responds as
19 follows: Defendant will produce all non-privileged responsive documents to this request,
20 including relevant correspondence between Plaintiff and Defendant's Human Resources
21 personnel for the El Segundo Refinery in its possession, custody or control.

22 **REQUEST FOR PRODUCTION NO. 15:**

23 Any and all documents **YOU** relied upon in making hiring decisions for the job
24 positions identified in Paragraph 29 of the Complaint.
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RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive and harassing, as it seeks documents that are not related to the subject matter involved in the pending action. Defendant objects to this request to the extent and as phrased, that it seeks documents that are protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this request to the extent that it seeks confidential and/or private personnel information of third parties. Defendant objects to this request on the grounds that the term “YOU” is overbroad.

Subject to and without waiving any of its objections, Defendant responds as follows: Defendant will produce – for the positions of El Segundo Operating Assistant, El Segundo Routine Maintenance General Team Lead, and El Segundo Maintenance Change Operating Assistant – the applications of Plaintiff and the job candidates who were selected for these positions in or around late 2019, as well as Defendant’s ranking of the candidates for these positions (if any), with redactions to protect the privacy of third parties.

REQUEST FOR PRODUCTION NO. 16:

Any and all communications regarding hiring decisions for the job positions described in Paragraph 29 of the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive and harassing, as it seeks documents that are not related

1 to the subject matter involved in the pending action. Defendant objects to this request to
2 the extent and as phrased, that it seeks documents that are protected from disclosure by
3 the attorney-client privilege and/or the attorney work product doctrine. Defendant
4 objects to this request to the extent that it seeks confidential and/or private personnel
5 information of third parties.

6 Subject to and without waiving any of its objections, Defendant responds as
7 follows: Defendant will produce – for the positions of El Segundo Operating Assistant, El
8 Segundo Routine Maintenance General Team Lead, and El Segundo Maintenance
9 Change Operating Assistant – the applications of Plaintiff and the job candidates who
10 were selected for these positions in or around late 2019, as well as Defendant’s ranking of
11 the candidates for these positions (if any), with redactions to protect the privacy of third
12 parties.

13 **REQUEST FOR PRODUCTION NO. 17:**

14 Any and all documents evincing the job duties, pay grade, organizational structure,
15 promotional opportunities for the Reliability Change Operating Assistant as identified in
16 Paragraph 31 of the Complaint.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

18 Defendant hereby incorporates by reference the general objections set forth above.
19 Defendant objects to this request on the grounds that it seeks documents that are not
20 relevant to the subject matter involved in the pending action and disproportionate to the
21 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
22 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
23 to the subject matter involved in the pending action. Defendant objects to this request to
24 the extent and as phrased, that it seeks documents that are protected from disclosure by
25 the attorney-client privilege and/or the attorney work product doctrine. Defendant
26 objects to this request to the extent that it seeks confidential and/or private personnel
27 information of third parties.

1 Subject to and without waiving any of its objections, Defendant responds as
2 follows: Defendant will produce all non-privileged responsive documents to this request
3 as to the job duties and pay grade of the Reliability Change Operating Assistant,
4 including the offer letter issued to Plaintiff for the Reliability Change Operating Assistant
5 position, Plaintiff's payroll records while he held the Reliability Change Operating
6 Assistant position, any performance reviews discussing Plaintiff's work while he held the
7 Reliability Change Operating Assistant position, and Plaintiff's own characterization of
8 his work while he held the Reliability Change Operating Assistant position, as discussed
9 in Plaintiff's Personal Experience Record form.

10 **REQUEST FOR PRODUCTION NO. 18:**

11 Any and all communications about or concerning the creation of the Reliability
12 Change Operating Assistant position for Plaintiff.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

14 Defendant hereby incorporates by reference the general objections set forth above.
15 Defendant objects to this request on the grounds that it seeks documents that are not
16 relevant to the subject matter involved in the pending action and disproportionate to the
17 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
18 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
19 to the subject matter involved in the pending action. Defendant objects to this request to
20 the extent and as phrased, that it seeks documents that are protected from disclosure by
21 the attorney-client privilege and/or the attorney work product doctrine. Defendant
22 objects to this request to the extent that it seeks confidential and/or private personnel
23 information of third parties.

24 Subject to and without waiving any of its objections, Defendant responds as
25 follows: Defendant will produce all non-privileged responsive documents to this request,
26 including the offer letter issued to Plaintiff for the Reliability Change Operating Assistant
27 position in its possession, custody or control.
28

1 **REQUEST FOR PRODUCTION NO. 19:**

2 Any and all communications by Dr. Eshiole Asekomeh about or concerning
3 Plaintiff.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

5 Defendant hereby incorporates by reference the general objections set forth above.
6 Defendant objects to this request on the grounds that it seeks documents that are not
7 relevant to the subject matter involved in the pending action and disproportionate to the
8 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
9 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
10 to the subject matter involved in the pending action. Defendant objects to this request to
11 the extent and as phrased, that it seeks documents that are protected from disclosure by
12 the attorney-client privilege and/or the attorney work product doctrine.

13 Subject to and without waiving any of its objections, Defendant responds as
14 follows: Defendant will produce all non-privileged responsive documents to this request,
15 including the Expatriate Exam Recommendations form completed by Dr. Asekomeh in
16 its possession, custody or control.

17 **REQUEST FOR PRODUCTION NO. 20:**

18 Any and all communications by Dr. Scott Levy about or concerning Plaintiff.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

20 Defendant hereby incorporates by reference the general objections set forth
21 above. Defendant objects to this request on the grounds that it seeks documents that are
22 not relevant to the subject matter involved in the pending action and disproportionate to
23 the needs of the case. Defendant objects to this request on the grounds that it is
24 overbroad, unduly burdensome, oppressive and harassing, as it seeks documents that are
25 not related to the subject matter involved in the pending action. Defendant objects to this
26 request to the extent and as phrased, that it seeks documents that are protected from
27 disclosure by the attorney-client privilege and/or the attorney work product doctrine.
28

1 Subject to and without waiving any of its objections, Defendant responds as
2 follows: Defendant will produce all non-privileged responsive documents to this request,
3 including correspondence between Dr. Scott Levy and Plaintiff, correspondence between
4 Dr. Scott Levy and Dr. Sahid Khan (Plaintiff's cardiologist), and correspondence
5 between Dr. Scott Levy and other medical professionals affiliated with Chevron Nigeria
6 Limited in connection with Plaintiff's medical clearance for the Reliability Engineering
7 Manager position in Escravos, Nigeria in its possession, custody or control.

8 **REQUEST FOR PRODUCTION NO. 21:**

9 Any and all communications by anyone in Chevron's Human Resources
10 Department about or concerning Plaintiff from January 1, 2019 to January 1, 2022.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

12 Defendant hereby incorporates by reference the general objections set forth above.
13 Defendant objects to this request on the grounds that it seeks documents that are not
14 relevant to the subject matter involved in the pending action and disproportionate to the
15 needs of the case. Defendant objects to this request on the grounds that it is overbroad as
16 to subject matter, unduly burdensome, oppressive and harassing, as it seeks documents
17 that are not related to the subject matter involved in the pending action. Defendant
18 objects to this request to the extent and as phrased, that it seeks documents that are
19 protected from disclosure by the attorney-client privilege and/or the attorney work
20 product doctrine.

21 Subject to and without waiving any of its objections, Defendant responds as
22 follows: Defendant will produce all correspondence and communications between
23 Plaintiff and El Segundo Human Resources personnel concerning Plaintiff's fitness for
24 duty for the Reliability Engineering Manager position in Escravos, Nigeria, and the
25 efforts to find a new position for Plaintiff after the rescission of the conditional offer for
26 the Reliability Engineering Manager position in its possession, custody or control.
27 Defendant will also produce a copy of Human Resources' notes of the exit interview with
28 Plaintiff.

1 **REQUEST FOR PRODUCTION NO. 22:**

2 Any and all documents reflecting Chevron's Medical Suitability for Expat
3 Assignment ("MSEA") policies in effect in California in 2019.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

5 Defendant hereby incorporates by reference the general objections set forth above.
6 Defendant objects to this request on the grounds that it seeks documents that are not
7 relevant to the subject matter involved in the pending action and disproportionate to the
8 needs of the case. Defendant objects to this request on the grounds that it is overbroad,
9 unduly burdensome, oppressive and harassing, as it seeks documents that are not related
10 to the subject matter involved in the pending action. Defendant objects to this request to
11 the extent and as phrased, that it seeks documents that are protected from disclosure by
12 the attorney-client privilege and/or the attorney work product doctrine.

13 Subject to and without waiving any of its objections, Defendant responds as
14 follows: Defendant will produce its Rotational Expatriate Assignments policy and its
15 MSEA Location Clusters Table for the time period of January 1, 2019 through the
16 termination of Plaintiff's employment on August 20, 2021.

17
18 Dated: June 5, 2024

19 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

20
21 By /s/ Tracey A. Kennedy
22 TRACEY A. KENNEDY
23 ROBERT E. MUSSIG
24 LINDA Z. SHEN
25 Attorneys for Defendant
26 CHEVRON U.S.A. INC. a Pennsylvania corporation
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VERIFICATION

I, Scott M. Banks declare and state:

I am Assistant Secretary of Chevron U.S.A. Inc. ("Chevron"), a defendant in the action *Mark Snookal v. Chevron U.S.A. Inc.* Case No. 2:23-cv-6302-HDV-AJR filed in the United States District Court for the Central District of California.

I am authorized to sign this verification on behalf of **Chevron**, and I make this verification for that reason.

I have reviewed the foregoing document titled **DEFENDANT CHEVRON USA. INC.'S RESPONSE TO PLAINTIFF MARK SNOOKAL'S REQUEST FOR PRODUCTION, SET ONE**

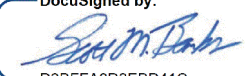
I am informed and believe that the matters stated therein are true and, on that ground verify such matters are true. I do not believe that any one person at **Chevron** knows all of the matters stated therein, and therefore these responses were prepared with the assistance and advice of employees of, and counsel for, **Chevron**, upon whose assistance and advice I have relied. These responses are limited by the records and information still in existence, presently recollected, and thus far discovered in the course of preparation of these responses. **Chevron** reserves the right to change, or supplement said responses, or to apply for relief to permit insertion of unintentionally omitted matter.

I declare under penalty of perjury of the State of California and the United States of America that the foregoing is true and correct.

Executed at San Ramon, California, on June 5, 2024.

Name: Scott M. Banks

Title: Assistant Secretary

DocuSigned by:

D3BFFA8D3EBD41C...

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Diego, State of California. My business address is 501 West Broadway, 18th Floor, San Diego, California 92101.


On June 6, 2024, I served true copies of the following document(s) described as **DEFENDANT CHEVRON U.S.A. INC.'S RESPONSE TO PLAINTIFF MARK SNOOKAL'S REQUEST FOR PRODUCTION, SET ONE** on the interested parties in this action as follows:

Dolores Y. Leal Olivia Flechsig ALLRED, MAROKO & GOLDBERG 6300 Wilshire Blvd. Suite 1500 Los Angeles, CA 90048-5217 dleal@amglaw.com oflechsig@amglaw.com	Attorneys for Plaintiff MARK SNOOKAL
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BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address lshen@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 6, 2024, at Los Angeles, California.



Linda Shen

EXHIBIT E

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
TRACEY A. KENNEDY, Cal Bar No. 150782
ROBERT E. MUSSIG, Cal. Bar No. 240369
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rmussig@sheppardmullin.com

Attorneys for Defendant.
CHEVRON U.S.A. INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DEFENDANT CHEVRON USA, INC.'S
RESPONSES TO PLAINTIFF MARK
SNOOKAL'S REQUESTS FOR
PRODUCTION (SET 2)**

Action Filed: August 3, 2023
Trial Date: February 4, 2025

PROPOUNDING PARTY: PLAINTIFF, MARK SNOOKAL

RESPONDING PARTY: DEFENDANT, CHEVRON USA, INC.

SET NO.: TWO

NUMBERS: 28-40

1 Pursuant to Federal Rule of Civil Procedure Rule 34, Defendant CHEVRON
2 U.S.A. INC. a Pennsylvania corporation (“Defendant” or “CHEVRON U.S.A. INC.”) for
3 itself and no other party, hereby objects and responds to the Request for Production of
4 Documents, Set No. One (“Requests”) served by Plaintiff MARK SNOOKAL
5 (“Plaintiff”), as set forth below.

6 **PRELIMINARY STATEMENT**

7 These responses are made solely for purposes of this action. Each response and/or
8 production is subject to all objections as to competence, relevance, materiality,
9 confidentiality, propriety, admissibility, privilege, privacy, propriety information, trade
10 secrets and the like, and any and all other objections and grounds which would require
11 the exclusion of any statements contained herein, if such statements were made by a
12 witness present and testifying at court, all of which objections and grounds are reserved
13 and may be interposed at the time of trial.

14 Defendant has not yet completed its investigation of the facts relating to this case,
15 has not fully completed discovery in this matter, and has not fully completed preparation
16 for trial. Accordingly, all of the following responses are based upon information and
17 documents presently available to and specifically known to Defendant at this time.
18 Furthermore, these responses disclose only those contentions that presently occur to
19 Defendant. Defendant is not making any incidental or implied admissions regarding the
20 contents of these documents. The fact that Defendant has responded or objected to any
21 Request or part thereof should not be taken as an admission that Defendant accepts or
22 admits the existence of any fact set forth or assumed by Plaintiff’s Request, or that such
23 response or objection constitutes admissible evidence. The fact that Defendant has
24 answered part or all of any Request is not intended and shall not be construed to be a
25 waiver by Defendant of all or any part of any objections to any Request.

26 It is anticipated that further discovery, independent investigation, legal research
27 and analysis will supply additional facts and add meaning to the known facts as well as
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1 establish entirely new factual contentions and legal contentions, all of which may lead to
2 substantial additions to, changes in and variations from the responses set forth herein.
3 These responses are given without prejudice to Defendant's rights to produce evidence of
4 any subsequently discovered facts or documents and/or tangible things that Defendant
5 may later discover or recall. Accordingly, Defendant hereby reserves the right to add to,
6 modify or otherwise change or amend the responses herein as additional facts are
7 ascertained, analysis and contentions are made, and legal research is completed. The
8 responses contained herein are made in a good faith effort to supply as much factual
9 information and specification of legal contentions as is presently known, but should in no
10 way be to the prejudice of Defendant in relation to further discovery, research or legal
11 analysis.

12 To the extent that the Request calls for information which was prepared in
13 anticipation of litigation for trial or for information or material covered by the work
14 product doctrine, or which constitutes information which is privileged or related to
15 confidential trade secrets or the privilege of privacy (including the freedom of association
16 and financial privacy), Defendant objects to responding to such Request and thus will not
17 supply nor render any information or documents protected from discovery by virtue of
18 the work product doctrine, the attorney client privilege, or the trade secret or privacy
19 privilege.

20 This preliminary statement is incorporated herein by reference to each of the
21 responses below as if stated in full.

22 **GENERAL OBJECTIONS**

23 1. Defendant objects to each and every Request to the extent it seeks
24 information privileged against disclosure by the attorney-client privilege and/or attorney
25 work-produce doctrine. No response, identification, or production should be construed as
26 a waiver of either the attorney-client privilege or attorney work-product doctrine.
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1 2. Defendant objects to each and every Request to the extent it seeks
2 information that is confidential, proprietary, or a business or trade secret.

3 3. Defendant objects to each and every Request to the extent it seeks
4 information pertaining to a non-party that is protected from disclosure by, among other
5 things, the California Constitution's right of privacy and other privacy privileges.

6 4. In responding to the following Requests, Defendant does not concede the
7 relevance or materiality of any such area of inquiry or document request to the subject
8 matter of this litigation.

9 5. Inadvertent production of privileged information by Defendant shall not
10 constitute a waiver of any applicable privilege or doctrine, including but not limited to
11 objections on the basis of competency, confidentiality, relevancy, materiality, privilege
12 and/or admissibility of evidence as such objections may apply at trial or otherwise in this
13 action.

14 6. Defendant objects to each and every Request to the extent it is overbroad
15 and unduly burdensome, and seeks information that is neither relevant nor reasonably
16 calculated to lead to the discovery of admissible evidence, including, without limitation,
17 on the grounds that a Request lacks reasonable date or time parameters.

18 7. Defendant objects to each and every Request to the extent it is vague,
19 ambiguous, and/or unintelligible.

20 8. Defendant objects to each and every Request to the extent the requested
21 information or documents are available from other sources and/or from other means.

22 Each of the foregoing general objections is hereby incorporated by reference into
23 each specific objection to each Request as if separately stated therein.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 28:

Produce all documents reflecting communications which refer or relate to Plaintiff Mark Snookal, made by any one of the persons identified in YOUR response to Plaintiff's Interrogatory No. 1.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request to the extent and as phrased, that it seeks documents that are protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this request to the extent that it seeks confidential and/or proprietary business information.

Subject to and without waiving any of its objections, Defendant responds as follows: Defendant has produced all responsive documents to this request in its possession, custody and control, which include all documents from Human Resources, medical professionals, and all medical documents and communications.

REQUEST FOR PRODUCTION NO. 29:

For each person identified in YOUR response to Plaintiff's Interrogatory No. 1, produce all documents reflecting the "discussions" and/or "information" provided "in connection with the decision to declare Plaintiff Mark Snookal 'not fit'" for duty for the Reliability Engineering Manager position in Escravos, Nigeria.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this request on the grounds that it seeks documents that are not relevant to the subject matter involved in the pending action and disproportionate to the needs of the case. Defendant objects to this request to the extent and as phrased, that it

1 seeks documents that are protected from disclosure by the attorney-client privilege and/or
2 the attorney work product doctrine. Defendant objects to this request to the extent that it
3 seeks confidential and/or proprietary business information.

4 Subject to and without waiving any of its objections, Defendant responds as
5 follows: Defendant has produced all responsive documents to this request in its
6 possession, custody and control, which include all documents from Human Resources,
7 and all medical documents and communications regarding Plaintiff.

8
9 **REQUEST FOR PRODUCTION NO. 30:**

10 For each person identified in YOUR response to Plaintiff's Interrogatory No. 1,
11 produce their current Curriculum Vitae ("CV") and resume.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

13 Defendant hereby incorporates by reference the general objections set forth above.
14 Defendant objects to this request on the grounds that it seeks documents that are not
15 relevant to the subject matter involved in the pending action and disproportionate to the
16 needs of the case.

17 Subject to and without waiving any of its objections, Defendant responds as
18 follows: After a diligent search and reasonable inquiry, Defendant has no responsive
19 document in its possession, custody or control.

20 **REQUEST FOR PRODUCTION NO. 31:**

21 Produce all documents reflecting communications which refer or relate to Plaintiff
22 Mark Snookal, made by any one of the persons identified in YOUR response to
23 Plaintiff's Interrogatory No. 2.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

25 Defendant hereby incorporates by reference the general objections set forth above.
26 Defendant objects to this request on the grounds that it seeks documents that are not
27 relevant to the subject matter involved in the pending action and disproportionate to the
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1 needs of the case, because the request lacks any subject matter or time frame. Defendant
2 objects to this request to the extent and as phrased, that it seeks documents that are
3 protected from disclosure by the attorney-client privilege and/or the attorney work
4 product doctrine. Defendant objects to this request to the extent that it seeks confidential
5 and/or proprietary business information. Defendant objects to this request on the grounds
6 that the term “YOU” is overbroad.

7 **REQUEST FOR PRODUCTION NO. 32:**

8 Any and all documents reflecting Plaintiff Mark Snookal’s job applications to any
9 job with YOU from January 1, 2019 to the present.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

11 Defendant hereby incorporates by reference the general objections set forth above.
12 Defendant objects to this request on the grounds that it seeks documents that are not
13 relevant to the subject matter involved in the pending action and disproportionate to the
14 needs of the case. Defendant objects to this request to the extent and as phrased, that it
15 seeks documents that are protected from disclosure by the attorney-client privilege and/or
16 the attorney work product doctrine. Defendant objects to this request to the extent that it
17 seeks confidential and/or proprietary business information.

18 Subject to and without waiving any of its objections, Defendant responds as
19 follows: Defendant has produced all responsive documents to this request in its
20 possession, custody and control, which include all documents and communications from
21 Human Resources.

22
23 **REQUEST FOR PRODUCTION NO. 33:**

24 Any and all documents reflecting Chevron’s policies, procedures, and/or best
25 practices for investigating complaints of discrimination in California from January 1,
26 2019 through January 1, 2022.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

2 Defendant hereby incorporates by reference the general objections set forth above.
3 Defendant objects to this request on the grounds that it seeks documents that are not
4 relevant to the subject matter involved in the pending action and disproportionate to the
5 needs of the case. Defendant objects to this request to the extent and as phrased, that it
6 seeks documents that are protected from disclosure by the attorney-client privilege and/or
7 the attorney work product doctrine. Defendant objects to this request to the extent that it
8 seeks confidential and/or proprietary business information.

9 Subject to and without waiving any of its objections, Defendant responds as
10 follows: Defendant has produced all responsive documents to this request in its
11 possession, custody and control, which include all documents from Human Resources
12 regarding policies and procedures and the employee handbooks.

13 **REQUEST FOR PRODUCTION NO. 34:**

14 Any and all documents reflecting Chevron's policies, procedures, and/or best
15 practices for providing disability accommodations in California from January 1, 2019
16 through January 1, 2022.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

18 Defendant hereby incorporates by reference the general objections set forth above.
19 Defendant objects to this request on the grounds that it seeks documents that are not
20 relevant to the subject matter involved in the pending action and disproportionate to the
21 needs of the case. Defendant objects to this request to the extent and as phrased, that it
22 seeks documents that are protected from disclosure by the attorney-client privilege and/or
23 the attorney work product doctrine. Defendant objects to this request to the extent that it
24 seeks confidential and/or proprietary business information.

25 Subject to and without waiving any of its objections, Defendant responds as
26 follows: Defendant has produced all responsive documents to this request in its
27
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1 possession, custody and control, which include all documents from Human Resources
2 regarding policies and procedures and the employee handbooks.
3

4 **REQUEST FOR PRODUCTION NO. 35:**

5 For each person identified in YOUR response to Plaintiff's Interrogatory No. 12,
6 produce their current Curriculum Vitae ("CV") and resume.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

8 Defendant hereby incorporates by reference the general objections set forth above.
9 Defendant objects to this request on the grounds that it seeks documents that are not
10 relevant to the subject matter involved in the pending action and disproportionate to the
11 needs of the case. Defendant objects to this request to the extent and as phrased, that it
12 seeks documents that are private and confidential personnel records of third parties.
13

14 **REQUEST FOR PRODUCTION NO. 36:**

15 Any and all job application materials, including but not limited to GO-400-2
16 forms, resumes, cover letters, references, interest forms, etcetera, submitted by any
17 applicant for the El Segundo Operating Assistant position YOU identified in response to
18 Plaintiff's Interrogatory No. 4.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

20 Defendant hereby incorporates by reference the general objections set forth above.
21 Defendant objects to this request on the grounds that it seeks documents that are not
22 relevant to the subject matter involved in the pending action and disproportionate to the
23 needs of the case. Defendant objects to this request to the extent and as phrased, that it
24 seeks documents that are protected from disclosure by the attorney-client privilege and/or
25 the attorney work product doctrine. Defendant objects to this request to the extent that it
26 seeks confidential and/or proprietary business information. Defendant objects to this
27
28

1 request on the ground it seeks documents that are private and confidential personnel
2 records of third parties.

3 **REQUEST FOR PRODUCTION NO. 37:**

4 Any and all job application materials, including but not limited to GO-400-2
5 forms, resumes, cover letters, references, interest forms, etcetera, submitted by any
6 applicant for the El Segundo Routine Maintenance General Team Lead position YOU
7 identified in response to Plaintiff's Interrogatory No. 4.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

9 Defendant hereby incorporates by reference the general objections set forth above.
10 Defendant objects to this request on the grounds that it seeks documents that are not
11 relevant to the subject matter involved in the pending action and disproportionate to the
12 needs of the case. Defendant objects to this request to the extent and as phrased, that it
13 seeks documents that are protected from disclosure by the attorney-client privilege and/or
14 the attorney work product doctrine. Defendant objects to this request to the extent that it
15 seeks confidential and/or proprietary business information. Defendant objects to this
16 request on the ground it seeks documents that are private and confidential personnel
17 records of third parties.

18 **REQUEST FOR PRODUCTION NO. 38:**

19 Any and all job application materials, including but not limited to GO-400-2
20 forms, resumes, cover letters, references, interest forms, etcetera, submitted by any
21 applicant for the El Segundo Maintenance Change Operating Assistant position YOU
22 identified in response to Plaintiff's Interrogatory No. 4.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

24 Defendant hereby incorporates by reference the general objections set forth above.
25 Defendant objects to this request on the grounds that it seeks documents that are not
26 relevant to the subject matter involved in the pending action and disproportionate to the
27 needs of the case. Defendant objects to this request to the extent and as phrased, that it
28

1 seeks documents that are protected from disclosure by the attorney-client privilege and/or
2 the attorney work product doctrine. Defendant objects to this request to the extent that it
3 seeks confidential and/or proprietary business information. Defendant objects to this
4 request on the ground it seeks documents that are private and confidential personnel
5 records of third parties.

6 **REQUEST FOR PRODUCTION NO. 39:**

7 Documents sufficient to reflect the extent to which the Reliability Engineering
8 Manager position in Escravos, Nigeria was modified or eliminated due to the COVID-19
9 pandemic.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

11 Defendant hereby incorporates by reference the general objections set forth
12 above. Defendant objects to this request on the grounds that it seeks documents that are
13 not relevant to the subject matter involved in the pending action and disproportionate to
14 the needs of the case. Defendant objects to this request on the grounds that it is
15 overbroad, unduly burdensome, oppressive and harassing, as it seeks documents that are
16 not related to the subject matter involved in the pending action and seeks documents that
17 demonstrate or prove a negative. Defendant objects to this request to the extent and as
18 phrased, that it seeks documents that are protected from disclosure by the attorney-client
19 privilege and/or the attorney work product doctrine. Defendant objects to this request to
20 the extent that it seeks confidential and/or proprietary business information.

21 **REQUEST FOR PRODUCTION NO. 40:**

22 Documents sufficient to reflect the extent to which the Reliability Engineering
23 Manager position in Escravos, Nigeria was restructured or eliminated any time after
24 January 1, 2019.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

26 Defendant hereby incorporates by reference the general objections set forth
27 above. Defendant objects to this request on the grounds that it seeks documents that are
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1 not relevant to the subject matter involved in the pending action and disproportionate to
2 the needs of the case. Defendant objects to this request on the grounds that it is
3 overbroad, unduly burdensome, oppressive and harassing, as it seeks documents that are
4 not related to the subject matter involved in the pending action and seeks documents that
5 demonstrate or prove a negative. Defendant objects to this request to the extent and as
6 phrased, that it seeks documents that are protected from disclosure by the attorney-client
7 privilege and/or the attorney work product doctrine. Defendant objects to this request to
8 the extent that it seeks confidential and/or proprietary business information.
9
10

11 Dated: August 12, 2024

12 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
13

14 By 

15 TRACEY A. KENNEDY
16 ROBERT E. MUSSIG
17 Attorneys for Defendant
18 CHEVRON U.S.A. INC.
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 333 South Hope Street, 43rd Floor, Los Angeles, CA 90071-1422.

On August 12, 2024, I served true copies of the following document(s) described as **DEFENDANT CHEVRON USA, INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S REQUESTS FOR PRODUCTION (SET 2)** on the interested parties in this action as follows:

Dolores Y. Leal
Olivia Flechsig
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Los Angeles, CA 90048-5217
dleal@amglaw.com;
oflechsig@amglaw.com

Attorneys for Plaintiff,
MARK SNOOKAL

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address bdelacruz@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 12, 2024, at Los Angeles, California.


Beannette De La Cruz